

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>GREAT AMERICAN INSURANCE COMPANY, Interpleader-Plaintiff, - against - MARTIN L. SOLOMON, EDWIN W. ELDER, WILLIAM J. BARRETT, WILMER J. THOMAS, JR., JOHN A. DORE, AND KARLA VIOLETTA, KINGSWAY FINANCIAL SERVICES, INC., and AMERICAN COUNTRY HOLDINGS, INC., Interpleader-Defendants.</p>	<p>07 Civ. 6498 MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u></p>
---	---

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Lewis J. Liman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Scott O. Reed of

Reardon Golinkin & Reed
111 W. Washington St., Suite 707
Chicago, IL 60602
Phone: (312) 855-3700
Fax: (312) 855-1089

Scott O. Reed is a member in good standing of the bars of the state of Illinois, the U.S. Court of Appeals for the Third and Seventh Circuits, and the U.S. District Courts for the Northern District of Illinois, the Southern District of Indiana, the Eastern District of Wisconsin and the Western District of Michigan. There are no pending disciplinary proceedings against Mr. Reed in any State or Federal Court.

#25 11-6-07 mcr
631580
FILED REPORT
S.D. OF N.Y.
NOV 6 2007

In support of this motion, annexed hereto as Exhibits A and B are the affidavits of Lewis J. Liman, dated October 25, 2007 and Scott O. Reed, dated October 22, 2007. Also attached as Exhibit C is the certificate of good standing as provided by the state of Illinois for Scott O. Reed. No brief or memorandum of law is necessary in support of this motion since it raises no issues of law and the relief sought is wholly within the Court's discretion.

Attached hereto as Exhibit D is a proposed form of order.

Dated: October 25, 2007
New York, New York

Respectfully Submitted,



By: Lewis J. Liman (LL9166)
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, New York 10006
Phone: (212) 225-2000
Fax: (212) 225-3999

Attorney for Interpleader- Defendants
Martin L. Solomon, Edwin W. Elder,
William J. Barrett, and William J. Thomas, Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<p>GREAT AMERICAN INSURANCE COMPANY,</p> <p style="text-align: center;">Interpleader-Plaintiff,</p> <p style="text-align: center;">- against -</p> <p>MARTIN L. SOLOMON, EDWIN W. ELDER, WILLIAM J. BARRETT, WILMER J. THOMAS, JR., JOHN A. DORE, AND KARLA VIOLETTA, KINGSWAY FINANCIAL SERVICES, INC., and AMERICAN COUNTRY HOLDINGS, INC.,</p> <p style="text-align: center;">Interpleader-Defendants.</p>	<p>07 Civ. 6498</p> <p>AFFIDAVIT OF LEWIS J. LIMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u></p>
---	---

LEWIS J. LIMAN, being duly sworn, hereby deposes and declares as follows:

1. I am a member of the firm Cleary, Gottlieb, Steen & Hamilton LLP, attorneys in this action for Interpleader-Defendants Martin L. Solomon, Edwin W. Elder, William J. Barrett, and Wilmer J. Thomas, Jr. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Interpleader-Defendant's motion to admit Scott O. Reed as counsel pro hac vice to represent Interpleader-Defendant John A. Dore in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June 1988. I am also admitted to the bar of the United States District Courts for the Southern District of New York, and am in good standing with this Court.

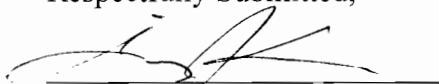
3. Mr. Reed is a partner of Reardon Golinkin & Reed of Chicago, Illinois. He is familiar with the facts and issues in this matter and is well qualified to represent Interpleader-Defendant John A. Dore in this action. As he attests in his individual affidavit, Mr. Reed is a member in good standing of the bars of, inter alia, the state of Illinois and the United States District Court for the Northern District of Illinois.

4. Based on the foregoing and the annexed affidavit of Scott O. Reed, I respectfully submit a proposed order granting the admission of Mr. Reed, pro hac vice, to represent Interpleader-Defendant John A. Dore in this matter.

WHEREFORE it is respectfully requested that the motion to admit Scott O. Reed, pro hac vice, to represent Interpleader-Defendant John A. Dore in the above-captioned matter, be granted.

Dated: October 25, 2007
New York, New York

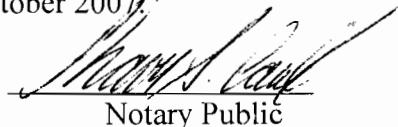
Respectfully Submitted,



Lewis J. Liman (LL9166)
Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza
New York, NY 10006
Phone: (212) 225-2000
Fax: (212) 225-3999

Attorney for Interpleader-Defendants
Martin L. Solomon, Edwin W. Elder,
William J. Barrett, and William J. Thomas, Jr.

Sworn before me this 25th day of October 2007.


Notary Public

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT AMERICAN INSURANCE COMPANY,	
-----------------------------------	--

Interpleader-Plaintiff,	
-------------------------	--

- against -	07 Civ. 6498
-------------	--------------

MARTIN L. SOLOMON, EDWIN W. ELDER, WILLIAM J. BARRETT, WILMER J. THOMAS, JR., JOHN A. DORE, AND KARLA VIOLETTO, KINGSWAY FINANCIAL SERVICES, INC., and AMERICAN COUNTRY HOLDINGS, INC.,	AFFIDAVIT OF SCOTT O. REED IN SUPPORT OF MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u>
---	---

Interpleader-Defendants.	
--------------------------	--

SCOTT O. REED, being duly sworn, hereby deposes and declares as follows:

1. I am a partner of Reardon Golinkin & Reed of Chicago, Illinois. I respectfully submit this declaration in support of Interpleader-Defendant John A. Dore's motion under Rule 1.3(c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order permitting me to appear as counsel pro hac vice on behalf of Interpleader-Defendant John A. Dore for purposes of this action.

2. I am a member in good standing of the bar of the state of Illinois. Annexed to this declaration is a certificate of good standing from that bar as Exhibit F. I also am a member in good standing of the bars of the U.S. Court of Appeals for the Third and Seventh Circuits and the U.S. District Courts for the Northern District of Illinois, the Southern District of Indiana, the Eastern District of Wisconsin and the Western District of Michigan. I have never been subject to disciplinary action, including censure, suspension, contempt or disbarment, in these or any other

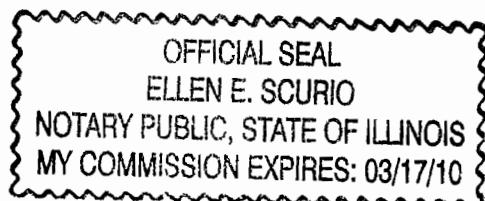
jurisdictions.

3. I further agree to be bound by the rules governing the Courts in the State of New York. For these reasons, I respectfully request admission pro hac vice to this Court.

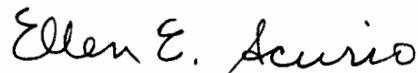
I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 22, 2007

Chicago, Illinois



REARDON GOLINKIN & REED


Scott O. Reed

O:\Dore\KSL\GAIC Interpleader\Pro Hac Vice Motion(Reed Affidavit).wpd



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

One North Old Capitol Plaza, Suite 333
Springfield, IL 62701
(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Scott Owen Reed
Reardon, Golinkin & Reed
111 W. Washington St., Suite 707
Chicago, IL 60602-2810

Chicago
Thursday, October 18, 2007

In re: Scott Owen Reed
Admitted: 10/29/1980
Attorney No. 3127632

To Whom It May Concern:

The records of the Clerk of the Supreme Court of Illinois and of this office indicate that the attorney named above was admitted to the practice of law in Illinois; is currently registered on the master roll of attorneys entitled to practice law in this state; and has never been disciplined; and is in good standing.

Very truly yours,
Jerome Larkin
Administrator

By: 
Thomas W. Peters
Registrar

TWP:jpo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT AMERICAN INSURANCE COMPANY,	
<p style="margin: 0;">Interpleader-Plaintiff,</p> <p style="margin: 0;">- against -</p> <p style="margin: 0;">MARTIN L. SOLOMON, EDWIN W. ELDER, WILLIAM J. BARRETT, WILMER J. THOMAS, JR., JOHN A. DORE, AND KARLA VIOLETTA, KINGSWAY FINANCIAL SERVICES, INC., and AMERICAN COUNTRY HOLDINGS, INC.,</p> <p style="margin: 0;">Interpleader-Defendants.</p>	<p style="margin: 0;">07 Civ. 6498</p> <p style="margin: 0;">ORDER FOR ADMISSION</p> <p style="margin: 0;"><u>PRO HAC VICE ON</u></p> <p style="margin: 0;"><u>WRITTEN NOTICE</u></p>

Upon the motion of Lewis J. Liman, attorney for Interpleader-Defendants Martin L. Solomon, Edwin W. Elder, William J. Barrett, and Wilmer J. Thomas, Jr., and his affidavit in support;

IT IS HEREBY ORDERED that

Scott O. Reed
 Reardon Golinkin & Reed
 111 W. Washington St., Suite 707
 Chicago, IL 60602
 Phone: (312) 855-3700
 Fax: (312) 855-1089

is admitted pro hac vice as counsel for John A. Dore in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF

password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2007

United States District/Magistrate Judge

O:\Dore\KSL\GAIC Interpleader\Pro Hac Vice Order.wpd

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury as follows:

On November 2, 2007, I caused to be served by U.S. Mail, the foregoing Motion to

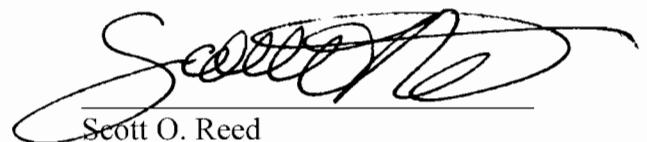
Admit Counsel Pro Hac Vice and supporting papers upon:

James A. Skarzynski, Esq.
Rachel L. Simon, Esq.
Eftherios Stefas, Esq.
Boundas, Skarzynski, Walsh & Black, LLC
One Battery Park Plaza, 32nd Floor
New York, NY 10004

Lewis J. Liman, Esq.
Alexander Janghorbani, Esq.
Chris Paton, Esq.
Cleary, Gottlieb, Steen & Hamilton
One Liberty Plaza
New York, NY 10006-1470

Harold J. Ruvoldt, Esq.
Ronald J. Hedges, Esq.
Christine M. Riley, Esq.
Nixon Peabody
437 Madison Ave.
New York, NY 10002

John S. Siffert, Esq.
Joseph Patrice, Esq.
Lankler Siffert & Wohl LLP
5000 Fifth Avenue, 33rd Floor
New York, NY 10110



Scott O. Reed
Reardon Golinkin & Reed
111 W. Washington St., Suite 707
Chicago IL 60602-3439
(312) 855-3700

Attorneys for Defendant John A. Dore